

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

TODD VALENTINE, an individual	)	
	)	
Plaintiffs,	)	
v.	)	No. 08 C 2172
	)	
ABBELL CREDIT CORPORATION	)	Judge Aspen
	)	
Defendant.	)	Magistrate Judge Schenkier

**JOINT DISCOVERY PLAN**

Plaintiff Todd Valentine and Defendant Abbell Credit Corporation submit the following Joint Discovery Plan:

1. **26(a)(1) Disclosures.** Disclosures pursuant to Rule 26(a)(1) shall be made on or before August 28, 2008.
2. **Written Discovery.** All written discovery, including interrogatories and document requests, shall be submitted to the opposing party on or before September 5, 2008. All written discovery shall be completed, and all motions to compel compliance with written discovery shall be filed, on or before October 30, 2008.
3. **Fact Depositions.** All depositions of fact witnesses shall be completed on or before February 16, 2009. Fact discovery shall close on February 16, 2009.
4. **Expert Discovery.** Plaintiff shall provide copies of its expert report(s), if any, to the opposing party on or before March 2, 2009. Defendant shall provide copies of the expert reports of its experts on or before March 16, 2008. Plaintiff shall provide expert reports of any rebuttal experts on or before March 30, 2008. Depositions of

experts, if any, shall be completed on or before April 30, 2009. Expert discovery shall close on April 30, 2009.

Respectfully Submitted,

TODD VALENTINE

By: /S/ John M. Heaphy  
One of his Attorneys

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